

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

SANDRA FRANKLIN,

Plaintiff,

v.

M.N.G., INC.,

Defendant.

CASE NO. 8:20CV38

**JOINT MOTION FOR ENTRY OF
CONSENT ORDER AND WITHDRAW
OF MOTION TO ENFORCE**

Plaintiff, Sandra Franklin, respectfully moves to withdraw her Motion to Enforce Settlement Agreement (Filing No. 12) as moot.

Plaintiff and Defendant, M.N.G., Inc., jointly notify the Court that a Consent Order resolving the claims brought by Plaintiff against Defendant was agreed upon by the parties. The parties respectfully request that the Court grant this motion, enter the attached Consent Order, retain jurisdiction for the duration of the Order to enforce its terms, and once the terms of the Order have been satisfied, dismiss this case with prejudice.

WHEREFORE, the parties respectfully request that the Court enter an order declaring the Motion to Enforce Settlement Agreement as withdrawn as moot and enter the Consent Order submitted by the parties.

SANDRA FRANKLIN, Plaintiff,

M.N.G., INC., Defendant,

By: /s/Edward I Zwilling
Edward Zwilling
of LAW OFFICES OF EDWARD I.
ZWILLING, LLC
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By: /s/Scott P. Moore
Scott Parrish Moore (NE#
20752)
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CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of the filing to the following:

Edward I. Zwilling

and I hereby certify that I have mailed by United States Postal Service, postage prepaid, this document to the following non CM/ECF participants:

None.

/s/Scott P. Moore

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